

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

ADAM DAUGHERITY,)
)
)
Plaintiff,)
)
vs.) Case No. 3:18-cv-05025-MDH
)
)
SARA McCULLY, et al.,)
)
)
Defendants.)

MOTION TO EXTEND DEADLINES

COMES NOW Plaintiff, by and through his counsel, and respectfully moves this Court to enter its Order extending the discovery and dispositive motion deadlines for the following reasons, to-wit:

1. This lawsuit was commenced on March 21, 2018, when Plaintiff filed his original Complaint, (Doc. No. 1), and Defendants thereafter timely filed their respective Answers (Doc. Nos. 24 and 25).
2. A scheduling order was entered on June 15, 2018 (Doc. No. 20), which was amended on October 17, 2018 (Doc. No. 34); May 30, 2019 (Doc. No. 59); September 25, 2019 (Doc. No. 78) and November 5, 2019 (Doc. No. 82).
3. That the discovery deadline was December 31, 2019, and the dispositive motion deadline is currently January 31, 2020 (Doc. No. 82).
4. That the depositions of Defendants McCully, Jenkins and Rackley that were scheduled for September 30, 2019, were commenced, however, during the deposition of Defendant Jenkins, it was discovered that there were additional Police manuals that had not been previously produced in discovery, so the Defendants' depositions were postponed

until the discovery responses could be supplemented. Counsel has attempted to reschedule the depositions and thus far has not been able to coordinate dates with all the parties. Additional time will be required to depose those witnesses.

5. That the Plaintiff's deposition was conducted on November 11, 2019.

6. That simultaneously herewith, the Plaintiff is seeking leave to file an Amended Complaint joining 3 additional parties. Additional time will be required for service on those parties and time afforded for their Answers.

7. That because Defendants McCully, Rackley and Jenkins' depositions still need to be scheduled, Plaintiff requests that the Court extend the current discovery deadline to **March 31, 2020**, and the current dispositive motion deadline to **April 30, 2020**.

8. That this motion is not made for the purpose of hinderance or delay, but in the interests of justice and for the purpose of accommodating settlement negotiations. Furthermore, a change in the aforesaid deadline will affect the Court's ability to rule on any dispositive motions in a timely manner and will affect the current trial date of this case.

WHEREFORE, the premises considered, the Plaintiff respectfully requests this Court to extend the current discovery deadline to **March 31, 2020**, and the current dispositive motion deadline to **April 30, 2020**.

Respectfully submitted,

By: /s/ Jason Coatney
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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of January, 2020, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, a true and correct copy of the same was served by US mail, postage prepaid, and via email to:

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